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RECEIVED
OFF OF THE ATTORNEY GENERAL

2019 SEP 30 A 8:14

September 24, 2019

Confidential

Brian E. Frosh
Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

RE: Data Breach Notification

Dear Attorney General Frosh:

Please accept this letter and its attachments as satisfaction of the notification requirements of your state law, which requires notification upon a breach of security of information involving your residents.

On September 3, 2019, a financial representative of The Northwestern Mutual Life Insurance Company ("Northwestern Mutual") lost an unencrypted USB drive and, to date, has been unsuccessful in finding it. The drive contained a document with the name, address, date of birth and social security number of one (1) Maryland resident.

Please note that, at the time of this letter, Northwestern Mutual does not have any information indicating that this information has been misused. The representative has been reminded of the importance of protecting client information and compliance with company policy prohibiting use of unencrypted USB drives. Northwestern Mutual has provided written notification and offered two years of free credit monitoring services to the client. For your reference, enclosed please find a copy of the notification letter that was sent to the client.

Please call me at 1-414-665-7371, if you have any questions or need further information.

Sincerely,

Darlene Spankowski
Privacy Specialist

Enclosure

Date

Name
Address
Address

Dear Name,

As we discussed, on September 3, I lost an unencrypted USB drive. The drive contained your confidential information including your name, address, date of birth and social security number. I am still trying to locate the drive and will let you know if I find it. At this time, I have no indication of misuse of your information.

Northwestern Mutual takes the preservation of confidentiality very seriously. I sincerely apologize that this incident occurred and for any concern it may have caused you.

We want to make you aware of steps you may take to guard against identity theft or fraud. Please review the enclosed Information About Identity Theft Protection.

As an added precaution, we have arranged to have AllClear ID protect your identity for 24 months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next 24 months.

AllClear Identity Repair: This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-877-676-0379 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

AllClear Fraud Alerts with Credit Monitoring: This service offers the ability to set, renew, and remove 90-day fraud alerts on your credit file to help protect you from credit fraud. In addition, it provides credit monitoring services, a once annual credit score and credit report, and a \$1 million identity theft insurance policy. For a child under 18 years old, AllClear ID ChildScan identifies acts of fraud against children by searching thousands of public databases for use of your child's information. To enroll in this service, you will need to provide your personal information to AllClear ID. You may sign up online at enroll.allclearid.com or by phone by calling 1-877-676-0379 using the following redemption code: XXXXXXXX

Please note: Following enrollment, additional steps are required by you in order to activate your phone alerts and fraud alerts, and to pull your credit score and credit file. Additional steps may also be required in order to activate your monitoring options.

You may also want to consider these additional safeguard options for your Northwestern Mutual policies. Be prepared to provide your account/policy number when requesting the following:

Life, Disability Income and Annuity: You can request a password to be used to verify your identity when you call the home office.

- For Life and Disability Income Policies, call 1-800-388-8123.
- For Annuities, call 1-888-455-2232.

We value the relationship we have established with you and are truly sorry for any inconvenience or concern caused by this incident. If you have any questions regarding this situation, please call me at XXX-XXX-XXXX.

Sincerely,

Name
Title

Attachments

Cc: Darlene Spankowski, Enterprise Privacy, Northwestern Mutual

INFORMATION ABOUT IDENTITY THEFT PROTECTION

REMAIN VIGILANT

Get a copy of your credit report and review the accounts and other information provided. You can get a free credit report from AnnualCreditReport.com or by calling 1-877-332-8228. You are entitled to one free report from each of the credit reporting agencies every year. Also review the account statements you receive each month from the banks and credit card companies you work with and report anything that looks suspicious. If applicable, you are also entitled to receive copies of police reports if any have been filed.

FRAUD ALERT

Place a fraud alert on your credit file. A fraud alert tells creditors to contact you before they open any new accounts or change your existing accounts. After placing a fraud alert on your credit file, you will receive a confirmation telephone call at the number you provide before a new credit account is opened. A fraud alert lasts for 90 days. If you want it in place longer, you will need to renew it quarterly. There is no cost to you for placing a fraud alert on your credit file.

To place a fraud alert on your credit, you may call any one of the three major credit reporting agencies listed below. As soon as one credit reporting agency confirms your fraud alert, the others are notified to place fraud alerts on your information as well.

Equifax: 1-800-525-6285

Experian: 1-888-397-3742

TransUnion Corp: 1-800-680-7289

SECURITY FREEZE

Consider placing a security freeze on your credit file. A security freeze prohibits anyone from opening new credit in your name – even you. The security freeze makes it impossible for anyone to access your credit report and it stays in place until you remove it. Pursuant to federal law, you cannot be charged a fee to place, lift or remove a security freeze. You must contact the credit reporting agencies separately to freeze your credit with all three of them.

To place a security freeze on your credit file, send a certified letter to each of the credit reporting agencies using the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, Georgia 30348

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013

TransUnion, Fraud Victim Asst.
P.O. Box 2000
Fullerton, CA 92834

You will need to include:

- Name
- Address
- Social Security number
- Proof of residence such as a copy of your driver's license, student ID card, utility bill, etc.

ADDITIONAL INFORMATION: For tips and other helpful information, contact:

- **Federal Trade Commission:** Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), <http://www.ftc.gov/bcp/edu/microsites/idtheft/>
- **Massachusetts residents:** You also have the right to obtain a police report.
- **Your state Attorney General:** For contact information, call the National Association of Attorneys General at (202) 326-6000 or go to <http://www.naag.org/>.
 - **Maryland residents:** Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us
 - **North Carolina residents:** North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, www.ncdoj.gov

AllClear Identity Repair Terms of Use

If you become a victim of fraud using your personal information without authorization, AllClear ID will help recover your financial losses and restore your identity. Benefits include:

- 24 months of coverage with no enrollment required.
- No cost to you — ever. AllClear Identity Repair is paid for by the participating Company.

Services Provided

If you suspect identity theft, simply call AllClear ID to file a claim. AllClear ID will provide appropriate and necessary remediation services ("Services") to help restore the compromised accounts and your identity to the state prior to the incident of fraud. Services are determined at the sole discretion of AllClear ID and are subject to the terms and conditions found on the AllClear ID website. AllClear Identity Repair is not an insurance policy, and AllClear ID will not make payments or reimbursements to you for any financial loss, liabilities or expenses you incur.

Coverage Period

Service is automatically available to you with no enrollment required for 24 months from the date of the breach incident notification you received from Company (the "Coverage Period"). Fraud Events (each, an "Event") that were discovered prior to your Coverage Period are not covered by AllClear Identity Repair services.

Eligibility Requirements

To be eligible for Services under AllClear Identity Repair coverage, you must fully comply, without limitations, with your obligations under the terms herein, you must be a citizen or legal resident eighteen (18) years of age or older, and have a valid U.S. Social Security number. Minors under eighteen (18) years of age may be eligible, but must be sponsored by a parent or guardian. The Services cover only you and your personal financial and medical accounts that are directly associated with your valid U.S. Social Security number, including but not limited to credit card, bank, or other financial accounts and/or medical accounts.

How to File a Claim

If you become a victim of fraud covered by the AllClear Identity Repair services, you must:

- Notify AllClear ID by calling 1.855.434.8077 to report the fraud prior to expiration of your Coverage Period;
- Provide proof of eligibility for AllClear Identity Repair by providing the redemption code on the notification letter you received from the sponsor Company;
- Fully cooperate and be truthful with AllClear ID about the Event and agree to execute any documents AllClear ID may reasonably require; and
- Fully cooperate with AllClear ID in any remediation process, including, but not limited to, providing AllClear ID with copies of all available investigation files or reports from any institution, including, but not limited to, credit institutions or law enforcement agencies, relating to the alleged theft.

Coverage under AllClear Identity Repair Does Not Apply to the Following:

Any expense, damage or loss:

- Due to
 - Any transactions on your financial accounts made by authorized users, even if acting without your knowledge, or
 - Any act of theft, deceit, collusion, dishonesty or criminal act by you or any person acting in concert with you, or by any of your authorized representatives, whether acting alone or in collusion with you or others (collectively, your "Misrepresentation");
- Incurred by you from an Event that did not occur during your coverage period; or
- In connection with an Event that you fail to report to AllClear ID prior to the expiration of your AllClear Identity Repair coverage period.

Other Exclusions:

- AllClear ID will not pay or be obligated for any costs or expenses other than as described herein, including without limitation fees of any service providers not retained by AllClear ID; AllClear ID reserves the right to investigate any asserted claim to determine its validity.
- AllClear ID is not an insurance company, and AllClear Identity Repair is not an insurance policy; AllClear ID will not make payments or reimbursements to you for any loss or liability you may incur.
- AllClear ID is not a credit repair organization, is not a credit counseling service, and does not promise to help you improve your credit history or rating beyond resolving incidents of fraud.
- AllClear ID reserves the right to reasonably investigate any asserted claim to determine its validity. All recipients of AllClear Identity Repair coverage are expected to protect their personal information in a reasonable way at all times. Accordingly, recipients will not deliberately or recklessly disclose or publish their Social Security number or any other personal information to those who would reasonably be expected to improperly use or disclose that Personal Information.

Opt-out Policy

If for any reason you wish to have your information removed from the eligibility database for AllClear Identity Repair, please contact AllClear ID:

<u>E-mail</u> support@allclearid.com	<u>Mail</u> AllClear ID, Inc. 823 Congress Avenue Suite 300 Austin, Texas 78701	<u>Phone</u> 1.855.434.8077
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